

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
V.)	Criminal No. 04-10298-DPW
)	
)	
MARKO BOSKIC)	

GOVERNMENT'S ASSENTED-TO MOTION TO CONTINUE DATE
FOR FILING RESPONSE TO DEFENDANT'S MOTION TO
DISMISS AND SUPPLEMENTARY MOTION TO SUPPRESS

Now come the United States and, with the assent of the defendant, requests that this Court continue the date for filing of government's response to defendant's motion to dismiss and supplementary motion to suppress. In support of this request the undersigned state as follows:

Two Assistant United States Attorneys represent the United States in this case. One will be on vacation during the week of February 27 through March 3, 2006. The other will be at a conference for anti-terrorism prosecutors from February 28 through March 3, 2006. Therefore, neither will be able to produce an adequate response in the time allowed.¹

The defendant has assented to the request for a continuance.

The hearings on these motions are scheduled to commence April 10 and continue April 18 and 19, 2006. Therefore, allowing this motion will not disrupt that schedule.

¹The filing date for the defendant's motions was continued by this Court at the defendant's request, and with the government's assent.

Wherefore, the United States requests that this Court continue the date for government's response to defendant's motions until March 20, 2006.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Jeffrey Auerhahn
Kimberly P. West
Jeffrey Auerhahn
Assistant U.S. Attorneys

Dated: February 27, 2006

Certificate of Service

I do hereby certify that a copy of the foregoing motion was served upon counsel for the defendant by electronic notice on this 27th day of February 2006.

/s/ Jeffrey Auerhahn
Jeffrey Auerhahn
Assistant U.S. Attorney